

1 STEPHANIE M. HINDS (CABN 154284)
United States Attorney
2 MICHELLE LO (NYRN 432163)
Chief, Civil Division
3 CHRISTOPHER F. JEU (CABN 247865)

4 150 Almaden Boulevard, Suite 900
San Jose, California 95113
5 Telephone: (408) 535-5082
Fax: (408) 535-5066
6 christopher.jeu@usdoj.gov

7 Attorneys for Federal Defendant Deb Haaland

8
UNITED STATES DISTRICT COURT
9
NORTHERN DISTRICT OF CALIFORNIA
10
SAN FRANCISCO DIVISION

11
12 TINA POTTS LINDROOS,

Case No. 20-cv-06897-EMC

13 Plaintiff,

14 v.

15 DEB HAALAND, United States Secretary
of the Interior,

**STIPULATED REQUEST TO EXTEND
DATE TO FILE SECOND AMENDED
COMPLAINT AND [PROPOSED] ORDER**

16
17 Defendant.

18
19 Pursuant to Civil Local Rule 6-2, Plaintiff Tina Potts Lindroos and Defendant Deb Haaland, the
20 U.S. Secretary of the Interior, respectfully request to extend the deadline to file a Second Amended
21 Complaint by two weeks, so that the parties may finalize a Settlement Agreement.

22 WHEREAS, on February 15, 2022, the Court urged the parties to meet and confer to settle the
23 case; and it set March 15, 2022, as the deadline for Plaintiff to file a Second Amended Complaint if the
24 Parties do not reach settlement. ECF No. 61.

25 WHEREAS, the parties have been negotiating settlement, and they have reached settlement
26 in principle.

27 WHEREAS, the parties have been working on the settlement agreement, but they need additional

1 time to finalize the terms of the settlement agreement.

2 WHEREAS, it would conserve judicial and party resources to extend the deadline for Plaintiff to
3 file a Second Amended Complaint, as an extension would help avoid motion practice regarding the
4 merits of Plaintiff's Second Amended Complaint.

5 THEREFORE, Plaintiff Tina Potts Lindroos and Defendant Deb Haaland, the U.S. Secretary of
6 the Interior, respectfully request that the Court extend the date to March 29, 2022, for Plaintiff to file a
7 Second Amended Complaint.

8 Respectfully submitted,

9 Dated: March 15, 2022

10 STEPHANIE M. HINDS
United States Attorney

11 By: /s/ Christopher F. Jeu
12 Christopher F. Jeu
13 Assistant United States Attorney
14 Attorneys for Defendant
Deb Haaland, U.S. Secretary of the Interior

15 As the ECF User whose identification and password are being used to file this Stipulation, I attest under
penalty of perjury that Plaintiff's counsel has concurred in the filing of this document.

16 THOMAS DIMITRE ATTORNEY AT LAW LLC

17 By: /s/ Thomas Dimitre
18 Thomas Dimitre
19 Attorney for Plaintiff
20 Tina Potts Lindroos